

1. Describe any such communication sought to be protected, including its subject matter; and
2. Identify the individual by whom it was made, the individual to whom it was directed, and all individuals present when it was made; and
3. Identify any document in which it was recorded, described or summarized; and
4. Identify any such document sought to be protected.

INTERROGATORIES¹

1) With respect to the equal protection claims in your Complaint, describe in detail how you claim Defendant Taylor racially discriminated against you:

- (a) Identify all facts that refute, relate to, or support your contention;
- (b) Identify the specific behavior or conduct that you allege that each Defendant engaged in;
- (c) Identify all persons with knowledge of such contention or facts;
- (d) Identify all documents that reflect, refer to or relate to such contention or

facts.

RESPONSE: By allowing the Warden and deputy warden of S.C.I. send me to A.S.D.A. Take my job and send me to D.C.C. but Allowed Inmate Allen ^{PENDRY} (possible) to Return From A.S.D.A. to his room in the meet building and get his job back. ~~Allen~~ ^{PENDRY} Allen ^{PENDRY} is white who works in the Educational department. Personnel in S.C.I. has this information.

2) With respect to the equal protection claims in your Complaint, describe in detail how you claim Defendant Kearney racially discriminated against you:

- (a) Identify all facts that refute, relate to, or support your contention;

¹ Please submit additional pages, if necessary.

(b) Identify the specific behavior or conduct that you allege that each Defendant engaged in;

(c) Identify all persons with knowledge of such contention or facts;

(d) Identify all documents that reflect, refer to or relate to such contention or facts.

RESPONSE: INMATE Wilson was moved from merit building for no disciplinary reasons then sent to D.C.C. INMATE Wilson was informed by J/O Kell Proline that the administration wanted to do me like they did INMATE Robert Saunders they move him to D.C.C.) ALLAN ^{PENDRY} (possible) was moved to A.S.D.A. his room was held for him and his job. ALLAN is white INMATE Wilson is Black. S.C.I. has all pertinent info. [↑] ALLAN PENDRY

3) With respect to the retaliation claim in your Complaint, describe in detail how you claim Defendant Deloy retaliated against you:

(a) Identify all facts that refute, relate to, or support your contention;

(b) Identify the specific behavior or conduct that you allege that each Defendant engaged in;

(c) Identify all persons with knowledge of such contention or facts;

(d) Identify all documents that reflect, refer to or relate to such contention or facts.

RESPONSE: INMATE informed Corp. Watson that a white inmate informed him about a certain J/O DIAZ offering food to find out information on Corp. Watson. Defendant Deloy moved inmate Wilson to A.S.D.A. there to P.I. building and informed him that he could not go back to merit building S.C.I. have all pertinent info.

4) Identify (a) every communication you have had with anyone, other than your attorney, concerning this litigation including but not limited to memoranda, journals, diaries,

letters, or petitions that you have written; (b) any person with knowledge of such communication(s); and (c) all documents supporting, evidencing, referring or relating to those communications.

RESPONSE: Attorney Benjamin Swartz
Letters; phone calls
Mother Bessie Wilson; sister Angela Wilson

5) Identify all documents which you intend to offer into evidence at the trial of this matter.

RESPONSE: ~~none at this time~~
Classification records, Job Positions
Disciplinary records, Building records with white
Inmates vs. Black Inmates.

6) Identify all persons having knowledge of the allegations in the complaint or answer whom you intend to call as witnesses at trial, excluding expert witnesses.

RESPONSE: All plaintiffs, c/o Karl Pauline
Defendant Deloy, Counselor
Donna Furhaman
All white inmates who has
been fired and given another job
and was not moved out of merit
building.

7) Identify any physical evidence which relates in any way to any of the facts alleged in the complaint or answer, or which you intend to offer in evidence at trial.

RESPONSE: All records of Black inmates Classification,
Jobs, Disciplinary records
All records of white inmates who was fired and
Received another job and never lefted the merit building.

8) Identify each expert you expect to call to testify as a witness at trial and state for each such expert (a) the qualifications of the expert; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is expected to testify; and (d) the summary of the grounds for such opinion.

RESPONSE: *None*

9) State the following about yourself:

- a. Full name, and any other names you have gone by or used,
- b. Social Security Number
- c. Date of birth, and any other date of birth you may have used or given,
- d. Place of birth
- e. Highest level of formal education that you successfully completed.

RESPONSE: *James Arthur Wilson, OMAHA, F. I.*
REDACTED *Doreen De. High school*

10) Identify all of your criminal convictions in the past 15 years, including the court, jurisdiction, date of conviction, date of sentencing, and the terms of the sentence.

RESPONSE: *Tenffian Cocaine Superior Court New Castle County*
Approx. May 01, Sept. 2, 01 10 years

11) Identify all employment you have had in the past 15 years, including employment you have had while incarcerated, and state for each position (a) the name and address of each employer; (b) name of supervisor; (c) dates of employment; (d) rate of pay; (e) job title and responsibilities; and (f) reason for termination.

RESPONSE: Tie man Garde Hill, or Z and y pool 9.60 A month
 Approx. E-Crew, Tutor at S.C.I. 844.00 A month approx.
 Dates cannot exactly Recall.

12) Identify all programs you have completed during your periods of incarceration over the last fifteen years, and state for each program (a) the name of the program; (b) the purpose of the program; (c) the time period during which you participated in the program; and (d) whether you successfully completed the program.

RESPONSE: A.V.P. Alternative to violence, Threshold decision making program, T.E.M.P.O. Drug program, Greentree program
 Drug program July 06, July 07 Graduation, Help self program.

13) Identify all physicians you have seen or been treated by in the past 10 years, including name, office address, telephone number, dates of examination or treatment, and the medical problem involved, if any.

RESPONSE: S.C.I. has info. / and on D.C.C.
 operation for Hydrocele

14) Identify and describe all accidents, injuries and ailments you have had in the past 15 years, including the history of any mental illness.

RESPONSE: *never twisted. CAR approx. 77 back injury*

15) Identify in detail the precise injury or harm you allege was sustained as a result of the allegations in the Complaint.

RESPONSE: *Unpaid to D.C.C. Job taking, Loss of Good Time.*

16) Describe any medical treatment you received as a result of the allegations in the Complaint, specifically addressing:

a. whether you requested any medical treatment at any DOC facility which you believe in any way resulted from the allegations in your complaint; and

b. the date and method used for any request listed in subparagraph a. of this interrogatory.

RESPONSE:

N/A

17) State whether you filed a complaint or grievance at the correctional institution or with the Department of Correction about the subject matter of each and every claim in your Complaint. If so, when were they filed, with who were they filed, and what was the response? If none were filed, explain why.

RESPONSE:

not Grievable
fear of being moved
before process begin

18) State whether you have ever received any diagnostic testing in relation to any diagnosed medical condition, including but not limited to any mental, emotional, psychiatric, or psychological condition. If your answer is yes, please state the requesting medical doctor, the type of testing, as well as the date and location of said testing.

RESPONSE:

N/A

19) State the total amount of compensatory damages you are claiming and the computation used to arrive at the sum.

RESPONSE:

See Complaints

20) Have you, or anyone acting on your behalf, obtained from any person any statement, declaration, petition, or affidavit concerning this action or its subject matter? If so, state:

- a. The name and last known address of each such person; and
- b. When, where, by whom and to whom each statement was made, and whether it was reduced to writing or otherwise recorded.

RESPONSE:

do not understand
N/A

NONE in my
possession other plaintiffs
are down S.C.I.

21) Identify all persons who provided information for all or any part of your answers to these Interrogatory Requests and the Request for Production filed contemporaneously herewith and, for each person named, identify the request as to which each such person provided information.

RESPONSE:

James A Wilson

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, et al. ;

Plaintiffs, ;

C.A. NO. 05-399-JJF

v. ;

Stanley Taylor, et al. ;

Defendants ;

;

I DECLARE that the following interrogatories
WAS ANSWERED with the best of my
Knowledge and Truthfully.

3/24/07

James A. Wilson
D.C.C. 1181 Piddock Rd
SMYRNA, DE. 19977

Subscribed to before me
this 28th day March 2007

Timothy J. Manto
Notary Public

my commission expires: June 14, 2008

I hereby sent a copy of the following
Answers to interrogatories and production of document
to the following entities

Stacey Xarhoulakos
Deputy Attorney General
Department of Justice
820 N. French St. 6th fl.
Wilm, De. 19801

U.S. District Court
844 N. King St.
Lockbox 18.
Wilm, De. 19801-3570

by placing in the U.S. mail on this
24th day of March 2007

3/24/07

James A. Wilson

James A. Wilson
UNIT V
DELAWARE CORRECTIONAL CENTER
8100 DODD ROAD
DOVER, DELAWARE 19977



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844 N. King St.
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